

LINDA WILLIAMS,)
)
 Plaintiff,)
)
 VS.)
)
 ENTERPRISE CITY SCHOOL)
 DISTRICT,)
)
 Defendant.)

VS.)
)
)
ENTERPRISE CITY SCHOOL)
DISTRICT,)
)
)
Defendant.)

CIVIL ACTION NO. 1:06CV598-WKW

PLAINTIFF LINDA WILLIAMS INTIAL DISCLOSURES

COMES NOW the Plaintiff, Linda Williams, and provides her initial disclosures pursuant to Fed.R.Civ.Pro. 26:

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

This Plaintiff is aware of the following persons who may have discoverable information that may likely support Plaintiff's defenses: (All listed persons have knowledge of Plaintiffs performance as a teacher).

1. Medaria Chang, student's mother
Enterprise, AL (phone) 347-3783
2. Allison Crooks, student's mother
Enterprise, AL (phone) 475-6520
3. Kim Clay, student's mother
Enterprise, AL (phone) 464-0370
4. Sharon Curry, student's mother
Enterprise, AL (phone) 393-0956
5. DeeDee Thomas, student's mother
Enterprise, AL (phone) 347-2969
6. Mike Arnold, retired principal
Enterprise, AL (phone) 347-1495

8. June White, resource teacher
Enterprise, AL (phone) 393-0620
9. Lynn Walls, formerly a secretary at Rucker Blvd
Panama City, FL 850-234-8009
10. Phyllis Uptain, secretary
Enterprise, AL (phone) 347-6621
11. Betty Ann Stinson, retired teacher
Enterprise, AL (phone) 464-1759
12. Chris Saffold, fired co-worker
Burndidge, AL (work phone) 735-2683
13. Jennifer Clark, co-worker
Elba, AL (phone) 897-2651
14. Fred Smith, Jennifer Clark's father
Elba, AL (phone)
15. Stacey Barnes, retired teacher
Enterprise, AL (phone) 347-6166
16. Kathy Bragg, retired teacher
Jack, AL (phone) 897-5115
17. Charles Rowe, retired teacher
Enterprise, AL (phone) 347-1518
18. Jamelle Siler, former co-worker
Geneva, AL (phone) 406-1670
19. Lia Rester, co-worker
Enterprise, AL (phone) 347-6907
20. Terri Averette, Board member
Enterprise, AL (phone) 393-4296
21. Beth Wiggins, co-worker EPA
Enterprise, AL (phone) 308-3253
22. Ginger Johnson, former librarian

23. Sandy Key, former co-worker
Enterprise, AL (phone) 897-8090

B. DOCUMENTS

Plaintiff discloses documents that may be used to support its defenses. By disclosure, the Plaintiff is not waiving any objections as to admissibility. The following documents are available for inspection:

1. Linda William's Application
2. Linda William's Classroom Evaluation Forms
3. Linda William's Professional Educator Certificate
4. Enterprise City Schools Certified Personnel Reference forms completed by Jim Reese, June White, and Michael Arnold on Linda Williams ability as a teacher as attached.
5. All documents listed by Defendant.

C. DAMAGES

6. Two year mitigated salary loss of \$15,000.00 per year. Losses due to lost benefit of medical insurance of approximately \$4,000.00. Lost retirement benefit of 2 years of service for estimated 20 years of future retirement benefits.


J. VICTOR PRICE (PRI015)

OF COUNSEL:

J. Victor Price, Attorney at Law
17 Sistrunk Street
Tallahassee, AL 36078
(334) 283-3388

CERTIFICATE OF SERVICE

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I hereby certify that I have served a copy of the foregoing document upon the following by placing a copy of the same in the United States mail, postage prepaid and properly addressed on this 20th day of July 2007.

R. Rainer Cotter, III
MARSH, COTTER & STEWART, LLP
PO Box 310910
Enterprise, AL 36331-0910


OF COUNSEL

ENTERPRISE CITY SCHOOLS

PERSONNEL DIRECTOR
POST OFFICE BOX 311790
ENTERPRISE, ALABAMA 36331
(334) 347-9531

CERTIFIED PERSONNEL REFERENCE FORM (three required)

Name of Applicant Linda Williams Social Security # 423-86-2404 Elementary/Secondary (Subject) Elem.
Name of Reference Jim Reese Position Superintendent of Education Business Phone No. 334-347-9531

I have applied for an instructional position with the Enterprise City Public Schools. Since employment is dependent in part on my references, I would appreciate your completing the applicable sections of the reference form below.

☐ I waive my rights to review this recommendation.

☒ I do not waive my rights to review this recommendation.

Date October 18, 2005

Signature of Applicant Linda Williams

Comparing this applicant to others with whom you have worked, observed, or taught, please check the following:

	SUPERIOR	ABOVE AVERAGE	AVERAGE	BELOW AVERAGE	POOR	NO BASIS FOR JUDGEMENT
Attendance and Punctuality	✓					
Personality	✓					
Understanding of Children and Learning		✓				
Planning and Organization		✓				
Competency in Subject Field		✓				
Use of Teaching Aids and Techniques		✓				
Evaluation and Assessment of Students		✓				
Support of Total School Program	✓					
Professional Attitude Toward School Work		✓				
Ability to Work With Pupils and Parents		✓				
Ability to Work With Other Teachers		✓				
Initiative and Enthusiasm		✓				
Classroom Management - Discipline/Control		✓				
Use and Care of School Facilities	✓					
Adherence to School Policies	✓					
Reliability in Records and Reports		✓				
Dependability		✓				
Maturity	✓					
Personal Appearance	✓					

- This information covers the period from 2002 to 2005
- Did you supervise this person? Yes ☒ No ☒ If no, in what capacity have you known the applicant? Administration - Teacher
- What was applicant's position in your school? Elementary teacher
- If applicant left your employ, why? Was a non-tenured teacher and employment was not renewed.
- Were any disciplinary actions initiated with the applicant? No
- If a vacancy existed in your school or business for which the applicant was qualified, would you recommend him or her for employment? Yes

Signature of Reference Jim Reese

Date 10-18-05

CERTIFIED PERSONNEL REFERENCE FORM (three required)

Linda Williams
 Name of Applicant
 423-86-2404
 Social Security #
 June White
 Name of Reference
 Resource Teacher
 Position
 Elementary
 Elementary/Secondary (Subject)
 347-3535
 Business Phone No.

I have applied for an instructional position with the Enterprise City Public Schools. Since employment is dependent in part on my references, I would appreciate your completing the applicable sections of the reference form below.

- ☐ I waive my rights to review this recommendation.
☐ I do not waive my rights to review this recommendation.

June 22, 2005
Date

Linda Williams
Signature of Applicant

Comparing this applicant to others with whom you have worked, observed, or taught, please check the following:

	SUPERIOR	ABOVE AVERAGE	AVERAGE	BELOW AVERAGE	POOR	NO BASIS FOR JUDGMENT
Attendance and Punctuality			✓			
Personality		✓				
Understanding of Children and Learning		✓				
Planning and Organization		✓				
Competency in Subject Field		✓				
Use of Teaching Aids and Techniques		✓				
Evaluation and Assessment of Students	✓					
Support of Total School Program	✓					
Professional Attitude Toward School Work	✓					
Ability to Work With Pupils and Parents	✓					
Ability to Work With Other Teachers	✓					
Initiative and Enthusiasm	✓					
Classroom Management - Discipline/Control	✓	NA				
Use and Care of School Facilities	✓					
Adherence to School Policies	✓					
Reliability in Records and Reports	✓	NA				
Dependability	✓					
Maturity	✓					
Personal Appearance	✓					

Mrs. Williams worked with me as an inclusion paraprofessional for 2 years. She was excellent at collaboration with general ed. teachers and at motivating lower functioning students.

1. This information covers the period from Aug. 1999 to May 2001.
 2. Did you supervise this person? Yes ☒ No ☐ If no, in what capacity have you known the applicant?
 3. What was applicant's position in your school? Paraprofessional for the Spe. Ed. Resource Program
 4. If applicant left your employ, why? Hired as a classroom teacher
 5. Were any disciplinary actions initiated with the applicant? No
 6. If a vacancy existed in your school or business for which the applicant was qualified, would you recommend him or her for employment? Yes

June E White
Signature

6/27/05
Date

ENTERPRISE CITY SCHOOLS

PERSONNEL DIRECTOR
POST OFFICE BOX 311790
ENTERPRISE, ALABAMA 36331
(334) 347-9531

CERTIFIED PERSONNEL REFERENCE FORM (three required)

Name of Applicant Linda Williams Social Security # 423-86-2404 Elementary/Secondary (Subject) Elementary
Name of Reference Mike Arnold Position Principal (Ret.) Business Phone No. 334-347-1495

I have applied for an instructional position with the Enterprise City Public Schools. Since employment is dependent in part on my references, I would appreciate your completing the applicable sections of the reference form below.

- ☐ I waive my rights to review this recommendation.
☐ I do not waive my rights to review this recommendation.

Date June 22, 2005

Signature of Applicant Linda Williams

Comparing this applicant to others with whom you have worked, observed, or taught, please check the following:

	SUPERIOR	ABOVE AVERAGE	AVERAGE	BELOW AVERAGE	POOR	NO BASIS FOR JUDGEMENT
Attendance and Punctuality	✓	✓				
Personality	✓	✓				
Understanding of Children and Learning	✓	✓				
Planning and Organization	✓	✓				
Competency in Subject Field	✓	✓				
Use of Teaching Aids and Techniques	✓	✓				
Evaluation and Assessment of Students	✓	✓				
Support of Total School Program	✓	✓				
Professional Attitude Toward School Work	✓	✓				
Ability to Work With Pupils and Parents		✓				
Ability to Work With Other Teachers		✓				
Initiative and Enthusiasm	✓	✓				
Classroom Management - Discipline/Control	✓	✓				
Use and Care of School Facilities	✓	✓				
Adherence to School Policies	✓	✓				
Reliability in Records and Reports	✓	✓				
Dependability	✓	✓				
Maturity	✓	✓				
Personal Appearance	✓	✓				

- This information covers the period from Aug 2000 to Sept 2003
- Did you supervise this person? Yes ☒ No ☐ If no, in what capacity have you known the applicant? Principal / Teacher
- What was applicant's position in your school? 1st Grade Title I K Aide / 1st Grade Teacher
- If applicant left your employ, why? N/A
- Were any disciplinary actions initiated with the applicant? None
- If a vacancy existed in your school or business for which the applicant was qualified, would you recommend him or her for employment? Highly

Signature of Reference Michael S. Cull

Date 7/5/05